

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

AIDA ORTIZ ORTIZ

Debtor

Bankruptcy No.: 10-08174 (SEK)

Chapter 11

JOINT MOTION AND STIPULATION TO RESOLVE CONTESTED MATTERS

COME NOW, Aida Ortiz Ortiz (“Debtor”), and DDR Río Hondo, LLC, SE (“DDR”), by their respective undersigned counsel, and respectfully allege, state and pray:

1. It is the parties’ desire to resolve their disputes concerning Debtor’s objection to DDR’s claim number 18 (Docket No. 78), and DDR’s rejection of Debtor’s amended plan of reorganization filed on February 8, 2011 (Docket No. 63) (the “Plan”), in order to avoid the time and expenses of litigating this matter.

2. In light of the foregoing, Debtor agrees to amend its Plan, and the undersigned parties consent to and request the entry of the annexed Stipulated Order.

3. After discussing their differing views of In re McSheridan, 184 B.R. 91 (9th B.A.P. 1995) and In re Paskorz, 284 B.R. 429 (Bankr. W.D.Pa. 2002), and considering the costs and uncertainties of litigation, the parties understand, and respectfully request the Court to find, that the Stipulated Order is in the best interest of the estate and its creditors, saving the estate substantial expense, and will facilitate confirmation of the Plan.

WHEREFORE, Aida Ortiz Ortiz and DDR Río Hondo, LLC SE request the Court to approve the foregoing and enter the Stipulated Order in the form annexed hereto; and such other relief as may be just.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to all participants therein.

In San Juan, Puerto Rico this 29th day of March, 2011.

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